

Andrew W. Stavros (8615)
Austin B. Egan (13203)
STAVROS LAW P.C.
8915 South 700 East, Suite 202
Sandy, Utah 84070
Tel: (801) 758-7604
Fax: (801) 893-3573
andy@stavroslaw.com
austin@stavroslaw.com

Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

VIA GROUP PARTNERS, LLC, a Utah limited liability company,

Plaintiff,

v.

CHRISTINE BARANOWSKI, an individual,
FRANK CLARK, an individual, STEPHEN LEE,
an individual, and ENCORE LEADERSHIP, LLC,
a Utah limited liability company,

Defendants.

DECLARATION OF FRANK CLARK

Case No.: 2:21-cv-00694-TC

Judge Tena Campbell

I, Frank Clark, declare as follows:

1. My name is Frank Clark, and I am a named defendant in this action.
2. I am over the age of eighteen years and competent to testify to the matters set forth in this declaration.
3. I have personal knowledge of the facts attested to in this declaration.

4. I am a resident and citizen of the state of Illinois.
5. I have never resided in Utah.
6. I have never conducted business in Utah.
7. I have never owned real or personal property located in the state of Utah.
8. I have never opened, maintained, or held a bank account in Utah.
9. I traveled to Utah on one occasion for approximately three days to meet the Raymonds, who I understood to be owners of the Plaintiff, Via Group Partners, LLC, prior to starting work with Plaintiff.
10. I worked for the Plaintiff, Via Group Partners, LLC, from approximately September 2020 until August 2021.
11. During such time, I worked out of my home in Illinois.
12. While I worked for Plaintiff, I never traveled to Utah for business.
13. While I worked for Plaintiff, I did not perform any work or services for any customers located in Utah, or direct any of my activities towards companies or businesses located in Utah.
14. While I worked for Plaintiff, I did not meet with any prospective customers or customers in Utah.
15. I did not utilize the internet, websites, social media, or any other services to purposefully direct solicitations and/or inquires to individuals in Utah during the time I worked for Plaintiff.
16. My activities in working for Plaintiff did not have any connection to Utah.

I hereby declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury that the foregoing is true and correct.

DATED this 23rd day of December 21, 2021.

/s/ **Frank Clark**
*Frank Clark (submitted by filing attorney with
consent of the undersigned; a copy Clark's
signature is on file with counsel)*